

# In The United States Court of Federal Claims

No. 06-123T

(Filed: July 25, 2012)

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EVERGREEN TRADING, LLC, by and through  
GLEN NUSSDORF AND CLAUDINE STRUM  
on behalf of GN INVESTMENTS, LLC, A  
Partner Other than the Tax Matters Partner,

Plaintiffs,

v.

THE UNITED STATES,

Defendant.

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## ORDER

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The Clerk is hereby directed to enter judgment as follows:

The adjustments set forth in the Notice of Final Partnership Administrative adjustment issued on September 26, 2005, with respect to the tax returns filed by Evergreen Trading, LLC, for the taxable years ending December 31, 1999, and December 31, 2000, are sustained, except as modified by petitioner's offer in compromise dated November 3, 2011, and the United States' acceptance dated May 14, 2012, by and through the Tax Division, Department of Justice.

**IT IS SO ORDERED.**

s/ Francis M. Allegra  
Francis M. Allegra  
Judge